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2 **WANGER JONES HELSLEY**

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10 Attorneys for Debtor in Possession, KEWEL K. MUNGER dba MUNGER INVESTMENTS

11 **IN THE UNITED STATES BANKRUPTCY COURT**

12 **EASTERN DISTRICT OF CALIFORNIA**

13 **FRESNO DIVISION**

14 In re:

15 KEWEL K. MUNGER dba MUNGER
16 INVESTMENTS,

17 Debtor in Possession.

18 SSN#: xxx-xx-8195

19 Address: 2907 Oakley Street
20 Bakersfield, CA 93311

21 Case No. 24-12709

22 Chapter 11

23 DC No.: WJH-7

24 Date: October 30, 2024

25 Time: 9:30 a.m.

26 Place: 2500 Tulare Street
27 Courtroom 11
28 Fresno, CA 93721

29 Judge: Honorable Jennifer E. Niemann

30 **APPLICATION TO EMPLOY APPRAISER**
31 **(GARY CRABTREE DBA AFFILIATED APPRAISERS)**

32 TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

33 Kewel K. Munger dba Munger Investments (the “Debtor”) hereby respectfully requests
34 authority to employ Gary Crabtree dba Affiliated Appraisers (the “Appraiser”) as Appraiser in
35 connection with the appraisal and eventual sale of real property located 10509 Finchley Drive,
36 Bakersfield, CA 93311 and 2200 Weybridge Drive, Bakersfield, CA (collectively, the
37 “Property”).

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1 This Application to Employ Appraiser (the “Application”) is filed pursuant to 11 U.S.C.
2 §§ 327(a), 328, and B.R. 2013, 2014, 2016, 5002, 5004, and 9001. This Court has jurisdiction
3 over this matter pursuant to 11 U.S.C. § 1334.

4 The Debtor files the Application as follows:

5 1. The Debtor has filed a voluntary petition pursuant to Title 11 of the United States
6 Code.

7 2. The Debtor has selected the Appraiser for employment because of the experience
8 and knowledge of an Appraiser in the appraisal of residential property appraisals, especially high-
9 end properties. The Debtor believes that the Appraiser is well qualified to provide such services
10 in this case.

11 3. It is necessary to employ an Appraiser because the Debtor seeks to sell the Property
12 to generate revenue to pay claims.

13 4. The Debtor hereby seeks authority to pay the Appraiser for services rendered from
14 the assets of the estate for a flat fee, plus additional time for testimony, if required, on an hourly
15 basis.

16 5. The Application is supported by the Declaration of Gary Crabtree in Support of
17 the Application (the “Declaration”). A copy of Appraiser’s employment agreement is attached to
18 the Declaration as Exhibit A. Attached to the Declaration as Exhibit B, and incorporated herein
19 by reference, is a verified statement of connections with the Debtor, creditors, any other party in
20 interest, their respective attorneys and accountants, the U.S. Trustee, any person employed in the
21 United States Trustee’s Office, or the United States Bankruptcy Judge reviewing the subject
22 Application or presiding over this case.

23 6. Based on the Application, the Declaration and exhibits thereto, the Debtor asserts
24 that the Appraiser holds no interest adverse to the Debtor and is a disinterested person within the
25 meaning of 11 U.S.C. § 327(a).

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1 WHEREFORE, the Debtor respectfully requests that the Court enter an Order authorizing
2 the Debtor to employ Appraiser to perform the services described herein and grant such other and
3 further relief as is just and proper.

4 Dated: October 15, 2024

5 WANGER JONES HELSLEY

6 By: 

7 Riley C. Walter

8 Ian J. Quinn

9 Attorneys for Debtor in Possession,

10 KEWEL K. MUNGER dba

11 MUNGER INVESTMENTS